

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRITISH TELECOMMUNICATIONS PLC
and BT AMERICAS, INC.,

Plaintiffs,

V.

PALO ALTO NETWORKS, INC.,

Defendant.

C. A. No. 22-1538-CJB

JURY TRIAL DEMANDED

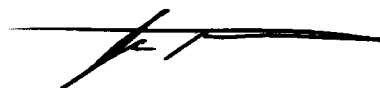
**DECLARATION OF BRUCE SCHNEIER
IN OPPOSITION TO DEFENDANT’S MOTION TO TRANSFER VENUE**

I, Bruce Schneier, declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.
2. In 1999, I co-founded Counterpane Internet Security, Inc., a managed security monitoring service.
3. I am a named inventor of United States Patent Nos. 7,159,237 and 7,895,641, both of which were initially assigned to Counterpane Internet Security, Inc..
4. Counterpane Internet Security, Inc. was acquired by BT Group plc in 2006, and eventually merged into BT Americas, Inc. in 2011. I continued to work at BT after its acquisition until 2014.
5. I understand that an issue in the above-captioned case is whether I would be available to testify at trial in the State of Delaware, if asked. I will make myself available to provide in-person trial testimony (if called) in the above-captioned case in the District of Delaware federal court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17 day of March, 2023, in Cambridge, Massachusetts.

A handwritten signature in black ink, appearing to read 'Bruce Schneier', written over a horizontal line.

Bruce Schneier